

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. 23-mc-\_\_\_\_\_

Plaintiff,

v.

**STIPULATION TO EXTEND  
TIME TO COMMENCE  
JUDICIAL FORFEITURE  
PROCEEDINGS**

\$30,800.00 IN U.S. CURRENCY,

Defendant,

and

ERIK WHITE,

Claimant.

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture by 90 days, up to and including May 30, 2023.

1. On or about September 6, 2022, the Minneapolis/St. Paul International Airport Police (“APD”) and members of the United States Drug Enforcement Administration (“DEA”) seized \$30,800.00 in U.S. Currency from the Claimant, Erik White.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On November 28, 2022, Erik White filed a claim for the Defendant Currency through his attorney, Edward Johnson III.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until May 30, 2023 to allow time for investigation and settlement discussions.

Dated: February 22, 2023

ANDREW M. LUGER  
United States Attorney  
*/s/ Lucas B. Draisey*  
BY: LUCAS B. DRAISEY  
Assistant U.S. Attorney  
Attorney ID No. 0401625  
600 United States Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
612-664-5600  
LDraisey@usa.doj.gov

Date: February 22, 2023

EDWARD JOHNSON & ASSOCIATES, P.C.  
*s/ Edward Johnson*  
Edward Johnson III  
Attorney ID No.  
1945 S. Halsted St. Ste. 309  
Pilsen East Center  
Chicago, IL 60608  
Ofc: 708.606.4386  
Fax: 708.526.9837

Attorney for Claimant Erik White